

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA

RENEE ZINSKY,

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

vs.

MICHAEL RUSSIN, RUSSIN  
FINANCIAL, RUSSIN GROUP, SIMON  
ARIAS, III, ARIAS AGENCIES, S.A.  
ARIAS HOLDINGS, LLC, AMERICAN  
INCOME LIFE INSURANCE COMPANY,

ELECTRONICALLY FILED

Defendants.

**DECLARATION OF ANNE R. DANA IN SUPPORT OF  
AMERICAN INCOME LIFE INSURANCE COMPANY'S  
MOTION TO COMPEL ARBITRATION AND STAY THE CASE**

ANNE R. DANA, under the pains and penalties of perjury, states:

1. I am an attorney admitted to practice in the State of New York. I am an attorney at King & Spalding LLP, counsel for Defendant American Income Life Insurance Company ("AIL") in the above-referenced matter. I submit this declaration in support of AIL's Motion to Compel Arbitration. I have personal knowledge of the facts stated herein, and could and would testify competently thereto if called as a witness in this matter.

2. On September 20, 2020, the Honorable Magistrate Judge Lisa Pupo Lenihan compelled the plaintiffs in *Berry et al v. American Income Life Insurance Company*, 2:20-CV-00110 (W.D. Pa.) to arbitrate their claims against AIL on the basis of an arbitration agreement almost identical to the one at issue here. A true and correct copy of the Memorandum Opinion and Order, which my office downloaded from the ECF docket in this case, is attached hereto as **Exhibit 1**.

3. On July 27, 2018, the Honorable A. Joe Fish of the United States District Court for the Northern District of Texas compelled the plaintiff in *Bruce v. Am. Income Life Ins. Co. et al.*, No. 3:18-CV-00258-G-BT (N.D. Tex.) to arbitrate his claims against AIL on the basis of an arbitration agreement almost identical to the one at issue here. A true and correct copy of this

order, which my office downloaded from the ECF docket in this case, is attached hereto as

**Exhibit 2.**

4. On June 17, 2019, the Honorable John T. Lu of the Superior Court for the Commonwealth of Massachusetts compelled the plaintiffs in *Samuel et al. v. Serur Agencies Mgmt. et al.*, No. 1881-CV-00261 (Mass. Super. Ct.) to arbitrate their claims against AIL on the basis of an arbitration agreement almost identical to the one at issue here. A true and correct copy of this order, which was obtained from AIL's files, is attached hereto as **Exhibit 3.**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was signed on June 13, 2022 in New York, New York.



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Anne R. Dana